

**WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

IN RE: )  
)  
STEVEN LYNN WOOLSEY, ) **Case No. 17-61345-can7**  
)  
Debtor, )  
)  

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J. KEVIN CHECKETT, )  
)  
Plaintiff, )  
)  
vs. ) **Adv. Case No. 18-06024**  
)  
KATRINA WOOLSEY, )  
MAVERICK CATTLE COMPANY, LLC, AND )  
SOUTHERN MISSOURI RECYCLING, LLC, )  
)  
Defendants. )

## INTERVENING PARTIES' NOTICE OF REMOVAL

To the Honorable Cynthia Norton, for the United States Bankruptcy Court for the Western District of Missouri.

**PLEASE TAKE NOTEICE** that Bank of Houston, a creditor and party-in-interest, pursuant to the provisions of 28 U.S.C. §§ 1441, 1446 et seq. Fed.R.Civ.P 81 and Bankruptcy Rule 9027 (hereinafter “Defendant” OR “Intervenor”), hereby files this Notice of Removal of a Civil Action to remove an action pending in Texas County, Missouri, styled **Bank of Houston vs. A-1 Towing, et al.**, Case No. 13TE-CC-00423. Intervenor sets forth the following grounds for removal.

**GROUND**

1. Intervenor is the Plaintiff in the action sought to be removed, and is intervening in this action to assert certain rights in property pursuant to Bankruptcy Rule 7024.

2. On or about October 9, 2013, Plaintiff started the State Court action with respect to certain fraudulent conveyances of the Co-Defendants, Katrina Woolsey, Maverick Cattle Company, LLC, and Southern Missouri Recycling, LLC. A copy of the Petition and all relevant pleadings are attached hereto as Exhibits "A" through "I".

3. Defendants have been served and have filed responsive pleadings in the State Court action.

4. A copy of all pleadings are set forth in the attached.

5. This Court has original jurisdiction of the claims herein pursuant to 28 U.S.C. § 157. This Court has original jurisdiction over causes and claims in the above-styled case in that the Debtor, Steven Woolsey, is a debtor in Bankruptcy No. 17-61345 and this action affects property of the estate and actions under 11 U.S.C. § 544.

6. Removal is timely as set forth in 28 U.S.C. § 1446(b)(1).

7. Pursuant to 20 U.S.C. § 1446 and Bankruptcy Rule 9027, Defendant and all other parties have confirmed and consent to removal of the action.

8. Intervenor will promptly serve this Notice of Removal on all parties, and will promptly file a copy of the Notice with the Clerk of the Court.

9. This Notice of Removal is subject to, and with full reservation of rights, including, but not limited to asserting amended claims in this action.

WHEREFORE, Defendant, Intervenor, as removing party, seeks an Order of Removal to the United States Bankruptcy Court for the Western District of Missouri.

LOWTHER JOHNSON, LLC

By: /s/ Lee J. Viorel  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served by electronic notice or by United States Mail, First Class postage prepaid, this 14<sup>th</sup> day of September, 2018, to:

*Plaintiff*

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/s/ Lee J. Viorel

Lee J. Viorel, MO Bar No. 36886